

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	)	
	)	
Plaintiff	)	Civil Action No. 13-4108
v.	)	
	)	
	)	
\$776,670.00 PREVIOUSLY	)	
CONTAINED IN BANK OF AMERICAN	)	
ACCOUNT NUMBER XXXXXXXXX3507	)	
HELD IN THE NAME OF SHIN'S	)	
TRADING, DBA CALA PRODUCTS	)	
	)	
Defendant <i>In Rem</i>	)	
_____	)	

VERIFIED CLAIM TO SEIZED PROPERTY

COMES NOW, Claimants Jung Min Shin and Heebok Shin, on behalf of Shin's Trading Company, Inc. ("Claimants"), by and through counsel and pursuant to Rule G(5) of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims, files this verified claim and states the following:

1. Shin's Trading Company, Inc. ("Shin's Trading") is a wholesaler of beauty products located in Los Angeles, California. It is organized as a corporation under the laws of the state of California.
2. Jung Min Shin and Heebok Shin are the sole owners of Shin's Trading.
3. The business operating account for Shin's Trading is maintained at Bank of America under the account number XXXXXXXXX3507. This account is used

for, and is critical to, conduct the day-to-day operations of Shin's Trading. Jung Min Shin and Heebok Shin are the signatories on this account.

4. As sole owners of Shin's Trading and signatories on the business bank account, Claimants are the owners of currency identified and seized under warrant Magistrate No. 13-4080 and described as \$766,670.00 in United States currency.

5. Claimants assert the right to defend this action.

6. I attest and declare under penalty of perjury that the foregoing is true and correct.

Executed this 2<sup>nd</sup> day of August, 2013 at Los Angeles, California.

Shin's Trading Company, Inc.

By: 

Its President

Jung Min Shin, Individually

And as co-owner of Shin's Trading

By: 

Its Vice-President

Heebok Shin, Individually

And as co-owner of Shin's Trading

## ACKNOWLEDGMENT

State of California

County of Los Angeles

On 08/02/2013 before me, Claudia E. Velasquez, Notary Public  
(insert name and title of the officer)

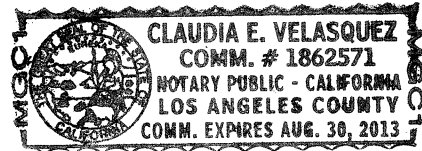
personally appeared Jung Min & Hee Bok Shin,  
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are  
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in  
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the  
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing  
paragraph is true and correct.

WITNESS my hand and official seal.

Signature

Claudia E. Velasquez (Seal)



**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on August 9, 2013 the foregoing document was filed using the Court's CM/EFC system, which will automatically send an email notification to all attorneys of record.

The undersigned counsel further stipulates that he has this day served a copy of this document via United States mail, postage prepaid to

Evan S. Weitz, Esq.  
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United States Attorney's Office for the District of New Jersey  
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